OVERVIEW OF THE AMERICAN COMMUNITY SURVEY (ACS) 2014 CONTENT REVIEW



1. Executive Summary

In 2014 the U.S. Census Bureau will conduct a top-to-bottom review of the American Community Survey (ACS), the nation's only available data source that provides annually updated information on demographic, social, economic, and housing characteristics of U.S. households at every level of geography, from the nation to the neighborhood.

The goal of this review is to ensure that the survey contains only the content and questions that are necessary, given that response to the survey, an official component of the Decennial Census Program, is mandatory.

Past inventories of federal agencies' documented uses of ACS data have yielded thousands of legal, regulatory, and programmatic needs. The 2014 ACS Content Review seeks to verify those and any other uses by applying new, objective scoring and weighting criteria to determine whether changes might be required to the survey. At the end of this process, the Census Bureau will make recommendations based on this Content Review, and create a baseline of uses that will help guide the future direction of the survey.

2. The History of American Community Survey Content

The ACS is an official part of the U.S. Census of Population and Housing with a foundation dating back to the first census in 1790.

James Madison, Father of the Constitution and fourth U.S. president, ensured that Article 1, Section 2 of the Constitution authorized Congress to include in the census questions that provided the level of detail needed to effectively govern the new country. "In order to accommodate our laws to the real situation of our constituents," he explained, "we ought to be acquainted with that situation."

Today, in addition to providing the objective basis for the distribution of more than \$450 billion in federal programming decisions, ACS data are used by public and business decision-makers to more clearly identify issues and opportunities and more effectively allocate scarce resources to address them.

Over the course of more than 200 years, policymakers added or removed questions on the census to reflect the nation's changing information needs and norms¹ Some of the questions have been included since the beginning. Social, economic and housing questions were added in the early 19th century. Much

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¹ See: http://www.census.gov/history/www/through the decades/index of questions/ and http://www.brookings.edu/~/media/Research/Files/Reports/2010/7/26%20acs%20reamer/0726 acs q uestionnaire.PDF>

of the current ACS content is driven by legislative requirements. For example, questions on computer usage and Internet access were added to support the 2008 Broadband Data Improvement Act.

The collection methods changed over time, too. Originally asked of every household once every ten years, the detailed questions were required of only a subset of households beginning in 1940 (the "long form.")

Beginning in 2005, the need for more current information lead to moving the detailed questions to a continuous, rolling sample to provide important annual socio-economic data for small communities annually. Renamed the "American Community Survey," the former Census "long form" remains a vital part of the Decennial Census Program.

3. Ensuring That Only Necessary Burden is Placed on Respondents

Balancing the nation's need for detailed socioeconomic information with the need to minimize burden on respondents is of paramount importance to the Census Bureau as well as the Office of Management and Budget (OMB), which manages survey content decisions through an interagency process.

A survey that respondents perceive as too lengthy, burdensome and intrusive will produce lower response rates and could undermine both the quality of the data and value of the survey. But reducing the length of the survey could have profound consequences on the information available for decision-making by communities and businesses if comparable data cannot be obtained from another source.

As the largest federal household survey, the ACS is a sought-after vehicle for federal and congressional policymakers looking to gauge or monitor progress in a particular topic area. Given the survey's mandatory nature, the Office of Management and Budget (OMB) will only approve content additions if stringent criteria are met. Over time, OMB, in consultation with the Census Bureau, has worked to refine ACS content criteria. In some cases, legislation may justify the inclusion of a topic in the ACS. In other cases, OMB may approve a new topic based on an agency's justification and program needs.

In Census 2000, OMB deemed that long form content could only include questions for which there was either:

- 1) a current federal law that explicitly called for the use of the decennial census data for a particular federal program;
- 2) a federal law or implementing regulation that required the use of specific data, and the decennial census was the historical or only source of data; or
- 3) an operational need by the Census Bureau.

In 2006, after full ACS implementation, criteria were expanded to include:

1) frequency of data collection,

- 2) level of geography needed to meet the required need, and
- 3) the existence of other sources of data that could meet a requestor's need in lieu of ACS data.

Any agency wanting to add content to the ACS must also meet additional stringent requirements under the OMB's Paperwork Reduction Act. Specifically, the agency must demonstrate that it has taken every reasonable step to ensure that the proposed collection of information:

- 1) is the least burdensome necessary for the proper performance of the agency's functions to comply with legal requirements and achieve program objectives;
- 2) is not duplicative of information otherwise accessible to the agency; and
- 3) has practical utility." (See 5 C.F.R. §1320.5)

As required by law, once a decade the Census Bureau submits the topics it proposes for the ACS and decennial census in years ending in "7." It submits the actual wording for questions in years ending in "8." Accordingly, the Census Bureau most recently provided topics and specific questions to Congress in March 2007 and March 2008 in preparation for the 2010 Census.

4. ACS Program Review

In December 2010, the ACS reached an important milestone when it released its first set of five-year estimates that produced estimates down to the neighborhood level. With the first full cycle of ACS data releases complete, Census Bureau Director Robert M. Groves launched a top-to-bottom assessment of the overall ACS program to gauge its effectiveness and operations so far.

The primary focus of the Program Review was on strengthening programmatic, technical, and methodological aspects of the survey. In compliance with the requirements of the Paperwork Reduction Act, the Program Review also sought to examine and confirm the value of each ACS question and to better understand the specific programs that rely on each. The Census Bureau obtained top-level information about data uses from federal agencies.

A review of the responses showed that agencies did not always provide adequate information to determine the need for a specific question or fully document the implications of discontinuing the use of a specific question. Although agencies provided a citation for their legal or regulatory justification, Census Bureau and Commerce Department review of a sample of these citations raised potential concerns. For example, some legal citations explicitly required the use of ACS data, while others required the agency to administer certain programs using data, without specifying the required or traditional source of that data.

Based on the weaknesses identified in the review of the agency responses, the final report of the Program Review in May of 2013 called for additional follow-up` in the form of a separate, more intensive ACS Content Review.

5. ACS Content Review

The Census Bureau, in coordination with OMB, will conduct the Content Review over the course of 2014.

The information gathering process involves meeting individually with federal agencies to obtain in-depth facts about their specific uses of ACS data. We will also obtain data-use information from non-federal data users through an online feedback instrument. Census Bureau technical staff will add information on internal data needs and uses as well as measures on data characteristics that will support discussions on the utility and quality of the ACS data. To help gauge burden, Census Bureau staff who work directly with survey respondents will provide detailed information about the time required and any difficulties associated with answering each individual question.

Staff will then analyze, score and weight all information gathered through objective criteria developed with input from members of the Interagency Council on Statistical Policy Subcommittee for the ACS (ICSP), an OMB-led group comprised of leadership from several federal statistical agencies².

These scores will be the basis for discussions between the Census Bureau, the Economic and Statistics Administration (ESA), OMB, the ICSP Subcommittee on the ACS, and stakeholder agencies to ensure that only necessary burden is placed on ACS respondents. To aid in these discussions, the Census Bureau will also solicit feedback from the public and invested stakeholders about their interactions and uses of the ACS. The Census Bureau will make the results of these discussions public, and post any decisions about the disposition of survey questions in late 2014 via the *Federal Register*.

6. Public Participation in the Content Review

The ACS produces fundamental information that is a public good, highly valued at all levels of government as well as across the spectrum of business, industry, nonprofits and academia. These nongovernmental stakeholders have an important role in deliberations about any proposed ACS content changes. Because they inform us on the uses and usefulness of the ACS information, the ACS Content Review is seeking their comment throughout the process.

To enable dialogue with the data-using public, in September of 2013 the Census Bureau launched a website (http://www.census.gov/acs/www/about the survey/acs content review/) dedicated to the Content Review process. The website will serve as a primary communications vehicle about the ACS Content Review, its progress and milestones.

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²In August 2012, the Interagency Council of Statistical Policy (ICSP) Subcommittee for the ACS was formed with the purpose of advising the Chief Statistician of OMB and the Census Bureau Director about the role of the ACS in meeting the needs of the federal statistical community. Members include: National Center for Education Statistics, Bureau of Labor Statistics, and National Agricultural Statistics Service.

In early 2014, we will add a feedback tool to the site to solicit input from the public about their interaction with and use of the ACS. We will incorporate this feedback into the overall findings.

Should the Content Review lead to any proposed changes to the ACS questionnaire, members of the public will have an opportunity to comment during a 60-day Federal Register comment period.

7. ACS Content Review Timeline

2013	
Late Fall	Define objective quantifiable measures to aid in analyzing the utility and difficulty of ACS questions.
2014	
Early 2014	 Gather additional details on uses of ACS data with federal agencies. The Census Bureau will meet with identified agency points of contact, discuss the available information, and provide any assistance required to finalize submissions. During this period, legal staff at the Department of Commerce will assist by reviewing any legal citations provided by the stakeholder agencies.
Early 2014	Gather metrics on respondent interactions with ACS questions. o The Census Bureau will survey ACS interviewers to collect additional information about their perceptions of respondent's interactions with each ACS topic.
Early 2014	Gather feedback from public and invested stakeholders via online tool on ACS Content Review website. O See section 6, "Public Participation in the Content Review."
Early 2014	Gather metrics on current ACS data. O The Census Bureau will compile information from the current ACS data to develop metrics about data quality (such as response rates and coefficients of variation for estimates) and sensitivity around questions (such as the number of complaints received by the Census Bureau on a certain ACS topic or question).
Summer 2014	Compile and analyze information and make initial recommendations for changes to the ACS questionnaire. The Census Bureau will score and weight each criterion for each topic using the process developed by the ICSP. The Census Bureau, along with the Economics Statistics Administration (ESA), OMB and the ICSP, will review the final weighted scores, consider supporting information (including information collected via the Internet feedback tool), discuss possible courses of action, and make initial

	recommendations on the ACS questions.
Late fall 2014	Make and communicate decisions, develop an action plan o The Census Bureau will communicate the findings and solicit feedback. The feedback will help in the development of an action plan.